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SEAL

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN
GISELLE MacNEILL,

Defendants.

INDICTMENT

VIO.

42 U.S.C. § 408(a)(7)(B)
[Misuse of a Social Security
Number] [*Counts 1, 3, 5, 7,*
9]

18 U.S.C. § 1028A(1)
[Aggravated Identity Theft]
[*Counts 2, 4, 6, 8, 10*]

18 U.S.C. § 1001(a)(2)
[False Statement] [*Count*
11]

18 U.S.C. § 2 [Aiding and
Abetting] [*Counts 1-8, 11*]

The Grand Jury charges:

Case: 2:09-cr-00036
Assigned To : Benson, Dee
Assign. Date : 1/14/2009
Description: USA v.

COUNT 1

[Misuse of a Social Security Number; Aiding and Abetting]
[42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2]

On or about August 30, 2007, in the Central Division of the District of Utah
and elsewhere,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did for the purpose of obtaining something of value from another person, and for some purpose, to wit, obtaining a Uniformed Services Identification Card (U.S. military member dependant identification card) in the name of Jillian G. MacNeill, did, with the intent to deceive, falsely represent Social Security Number xxx-xx-8175 to be the Social Security account number assigned to Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill, when in fact such number is not assigned to her, and did aid, abet, counsel, command, induce, and procure therein; all in violation of Title 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2, and punishable thereunder.

COUNT 2

[Aggravated Identity Theft; Aiding and Abetting]
[18 U.S.C. §§ 1028A and 2]

On or about August 30, 2007, in the Central Division of the District of Utah
and elsewhere,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did, without lawful authority, knowingly transfer, possess
and use a means of identification of another person, to wit, the Social Security
Account Number of G.M.M., during and in relation to a felony violation
enumerated in 18 U.S.C. § 1028A(c), to wit, the misuse of a Social Security
Account Number as alleged in Count 1, which Count is incorporated herein by
reference, and did aid, abet, counsel, command, induce, and procure therein; all in
violation of 18 U.S.C. § 1028A(a)(1) and 18 U.S.C. § 2, and punishable under 18
U.S.C. § 1028A(a)(1).

COUNT 3

[Misuse of a Social Security Number; Aiding and Abetting]
[42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2]

On or about October 3, 2007, in the Central Division of the District of Utah,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did for the purpose of obtaining something of value from another person, and for some purpose, to wit, obtaining a signature card in the name of Jillian G. MacNeill for Zions Bank account number xxx-xxx-x056, did, with the intent to deceive, falsely represent Social Security Number xxx-xx-8175 to be the Social Security account number assigned to Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill, when in fact such number is not assigned to her, and did aid, abet, counsel, command, induce, and procure therein; all in violation of Title 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2, and punishable thereunder.

COUNT 4

[Aggravated Identity Theft; Aiding and Abetting]
[18 U.S.C. §§ 1028A and 2]

On or about October 3, 2007, in the Central Division of the District of Utah
and elsewhere,

MARTIN JOSEPH MacNEILL
and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did, without lawful authority, knowingly transfer, possess
and use a means of identification of another person, to wit, the Social Security
Account Number of G.M.M., during and in relation to a felony violation
enumerated in 18 U.S.C. § 1028A(c), to wit, the misuse of a Social Security
Account Number as alleged in Count 3, which Count is incorporated herein by
reference, and did aid, abet, counsel, command, induce, and procure therein; all in
violation of 18 U.S.C. § 1028A(a)(1) and 18 U.S.C. § 2, and punishable under 18
U.S.C. § 1028A(a)(1).

COUNT 5

[Misuse of a Social Security Number; Aiding and Abetting]
[42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2]

On or about December 27, 2007, in the Central Division of the District of
Utah,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did for the purpose of obtaining something of value from another person, and for some purpose, to wit, obtaining a signature card in the name of Jillian G. MacNeill for Zions Bank account number xxx-xxx-590, did, with the intent to deceive, falsely represent Social Security Number xxx-xx-8175 to be the Social Security account number assigned to Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill, when in fact such number is not assigned to her, and did aid, abet, counsel, command, induce, and procure therein; all in violation of Title 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2, and punishable thereunder.

COUNT 6

[Aggravated Identity Theft; Aiding and Abetting]
[18 U.S.C. §§ 1028A and 2]

On or about December 27, 2007, in the Central Division of the District of Utah and elsewhere,

MARTIN JOSEPH MacNEILL
and
GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did, without lawful authority, knowingly transfer, possess and use a means of identification of another person, to wit, the Social Security Account Number of G.M.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, the misuse of a Social Security Account Number as alleged in Count 5, which Count is incorporated herein by reference, and did aid, abet, counsel, command, induce, and procure therein; all in violation of 18 U.S.C. § 1028A(a)(1) and 18 U.S.C. § 2, and punishable under 18 U.S.C. § 1028A(a)(1).

COUNT 7

[Misuse of a Social Security Number; Aiding and Abetting]
[42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2]

On or about February 4, 2008, in the Central Division of the District of
Utah,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did for the purpose of obtaining something of value from another person, and for some purpose, to wit, obtaining signature cards in the name of Jillian G. MacNeill for Zions Bank accounts numbered xxx-xxx-x545 and xxx-xxx-443, did, with the intent to deceive, falsely represent Social Security Number xxx-xx-8175 to be the Social Security account number assigned to Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill, when in fact such number is not assigned to her, and did aid, abet, counsel, command, induce, and procure therein; all in violation of Title 42 U.S.C. § 408(a)(7)(B) and 18 U.S.C. § 2, and punishable thereunder.

COUNT 8

[Aggravated Identity Theft; Aiding and Abetting]
[18 U.S.C. §§ 1028A and 2]

On or about February 4, 2008, in the Central Division of the District of Utah
and elsewhere,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendants herein, did, without lawful authority, knowingly transfer, possess
and use a means of identification of another person, to wit, the Social Security
Account Number of G.M.M., during and in relation to a felony violation
enumerated in 18 U.S.C. § 1028A(c), to wit, the misuse of a Social Security
Account Number as alleged in Count 7, which Count is incorporated herein by
reference, and did aid, abet, counsel, command, induce, and procure therein; all in
violation of 18 U.S.C. § 1028A(a)(1) and 18 U.S.C. § 2, and punishable under 18
U.S.C. § 1028A(a)(1).

COUNT 9

[Misuse of a Social Security Number]
[42 U.S.C. § 408(a)(7)(B)]

On or about March 7, 2008, in the Central Division of the District of Utah,
GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,
the Defendant herein, did for the purpose of obtaining something of value from
another person, and for some purpose, to wit, obtaining a Utah identification card
in the name of Jillian G. MacNeill from the Utah Department of Public Safety, did,
with the intent to deceive, falsely represent Social Security Number xxx-xx-8175
to be the Social Security account number assigned to Gypsy Jyll Willis a/k/a
Jillian Giselle MacNeill, when in fact such number is not assigned to her, all in
violation of Title 42 U.S.C. § 408(a)(7)(B) and punishable thereunder.

COUNT 10

[Aggravated Identity Theft; Aiding and Abetting]
[18 U.S.C. §§ 1028A and 2]

On or about March 7, 2008, in the Central Division of the District of Utah
and elsewhere,

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

the Defendant herein, did, without lawful authority, knowingly transfer, possess and use a means of identification of another person, to wit, the Social Security Account Number of G.M.M., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, the misuse of a Social Security Account Number as alleged in Count 9, which Count is incorporated herein by reference, and did aid, abet, counsel, command, induce, and procure therein; all in violation of 18 U.S.C. § 1028A(a)(1) and 18 U.S.C. § 2, and punishable under 18 U.S.C. § 1028A(a)(1).

COUNT 11

[False Statement; Aiding and Abetting]
[18 U.S.C. §§ 1001(a)(2) and 2]

On or about February 28, 2008, in the Central Division of the District of Utah and elsewhere,

MARTIN JOSEPH MacNEILL

and

GYPSY JYLL WILLIS, a/k/a JILLIAN GISELLE MacNEILL,

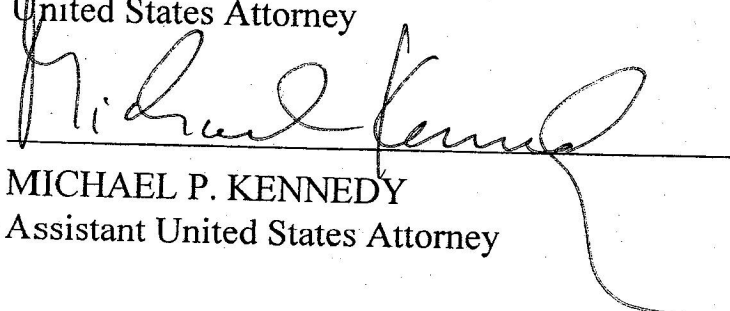
the Defendants herein, in a matter within the jurisdiction of a department or agency of the Executive Branch of the United States Government, to wit, the

Social Security Administration, did knowingly and willfully make materially false, fictitious, and fraudulent statements and representations, in that on an Application for Replacement Social Security Number Card submitted by Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill for a card issued to G.M.M. with Social Security Account Number xxx-xx-8175, it was claimed that the applicant was G.M.M. with a date of birth of 03/[redacted]/1971, when in fact the applicant was Gypsy Jyll Willis a/k/a Jillian Giselle MacNeill and G.M.M.'s birth date is not 03/[redacted]/1971, as they well knew, and did aid, abet, counsel, command, induce, and procure therein; all in violation of 18 U.S.C. § 1001(a)(2) and 18 U.S.C. § 2.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN
United States Attorney


MICHAEL P. KENNEDY
Assistant United States Attorney